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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

**UNITED AFRICAN-ASIAN
ABILITIES CLUB, ON BEHALF
OF ITSELF AND ITS
MEMBERS; JAMES LEE, An
Individual**

Plaintiffs,

v.

**PCS DEVELOPMENT, LLC; and
DOES 1 THROUGH 10, Inclusive,**

Defendants.

**Case#: 2:25-cv-00494-MEMF-
AGR**

**STIPULATION FOR DISMISSAL
WITH PREJUDICE OF ALL
DEFENDANTS AND
PLAINTIFFS' COMPLAINT IN
ITS ENTIRETY**

[Fed. R. Civ. P. Rule 41(a)(2)]

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1 IT IS HEREBY STIPULATED by and between the Plaintiffs UNITED
2 AFRICAN-ASIAN ABILITIES CLUB, ON BEHALF OF ITSELF AND ITS
3 MEMBERS; and JAMES LEE, An Individual, on the one hand, and Defendant PCS
4 DEVELOPMENT, LLC, on the other hand, by themselves and/or through their
5 respective attorneys of record, pursuant to Federal Rules of Civil Procedure, Rule 41
6 (a)(1) and (2), that this Court enter a dismissal with prejudice of all Defendants from
7 Plaintiffs' Complaint. The parties herein reached settlement of the present action.
8 Each party shall bear their own respective attorney fees and costs.

9 Since no Defendants shall remain in this action, Plaintiffs request that
10 Plaintiffs' Complaint be dismissed with prejudice in its entirety.
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12 **IT IS SO STIPULATED.**
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14 Dated: 09/09/2025

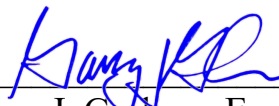
LIGHTNING LAW, APC

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16 By: /S/ David C. Wakefield, Esq.

17 David C. Wakefield, Esq.
18 Attorney for Plaintiffs
19

20 Dated: September 9, 2025

RASKIN GORHAM ANDERSON LAW

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22 By: /S/ 
23 Gary J. Gorham, Esq.
24 Attorney for Defendant
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SIGNATURE ATTESTATION

Pursuant to Civil L.R 5-4.3.4(a)(2)(i), I hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in this document's content and have authorized the filing of this document with the use of their electronic signature.

Dated: 09/09/2025

LIGHTNING LAW, APC

By: /S/ David C. Wakefield, Esq.

David C. Wakefield, Esq.
Attorney for Plaintiffs

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF SAN DIEGO

I employed in the County of San Diego, State of California. I am over the age of 18 and not a party to the within action. My business address is 10620 Trenea Street, Suite 230, San Diego, CA 92131.

On 09-09-2025, I served the document described below on all interested parties in the attached service list by the method indicated below:

1. JOINT STIPULATION FOR DISMISSAL WITH PREJUDICE OF ALL DEFENDANTS AND PLAINTIFFS' COMPLAINT IN ITS ENTIRETY

2. ORDER GRANTING DISMISSAL WITH PREJUDICE OF ALL DEFENDANTS AND PLAINTIFFS' COMPLAINT IN ITS ENTIRETY

BY MAIL - I deposited such envelope in the mail at San Diego, California. The envelope was mailed with postage thereon fully prepaid. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Diego, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one (1) day after date of deposit for mailing in affidavit.

BY PERSONAL SERVICE – I caused such envelope to be delivered by a process server employed by _____

VIA FACSIMILE – I faxed said document, to the office(s) of the addressee(s) shown above, and the transmission was reported as complete and without error.

XXX BY ECF ELECTRONIC TRANSMISSION – I transmitted a PDF version of this document by electronic transmission to the party (s) identified on the attached service list using the court supported ECF e-mail to the address(s) indicated.

BY OVERNIGHT DELIVERY – I deposited such envelope for collection

1 and delivery by the Federal Express with delivery fees paid or provided for in
2 accordance with ordinary business practices. I am “readily familiar” with the
3 firm’s practice of collection and processing packages for overnight delivery by
4 Federal Express. They are deposited with a facility regularly maintained by
Federal Express for receipt on the same day in the ordinary course of business.

5 _____ (State) I declare under penalty of perjury under the laws of the State of
6 California that the above is true and correct.

7 **XX** (Federal) I declare that I am employed in the office of a member of the
8 bar of this Court at whose direction the service was made.
9 At San Diego, California.

10 /s/ David C. Wakefield
11 David C. Wakefield

12 **SERVICE LIST**

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